

Attachment A

- Application of the Central Coast post-construction criteria in Goleta would result in the retention of approximately 5 inches of rainfall volume (35% of annual rainfall) for all projects in the top tier ($\geq 22,500$ square feet).
- For Goleta the 95th storm runoff depth is 2.5" which is approximately two times the 85% storm.
- The Post-construction requirements exceed the MEP standard, which is flexible, continually evolves, and requires the consideration of site-specific factors.
- The Post-construction requirements are complex and confusing, with multiple criteria (85th percentile, 95th percentile, x1.963 multiplier, 10% of EISA, 4 tiers v. 2 tiers in Revised Permit, etc.).
- The Post-construction Criteria applies unconnected components from various adopted programs. the use of the 1.963 multiplier is an outdated and incorrectly applied Water Environmental Federation MOP 23 approach that multiplies the retention/water quality volume in order to capture "all events *up to and including*" the 85th or 95th, as appropriate. We believe that applying that multiplier to the 95th percentile storm results in retention requirements that are above that which is necessary to achieve protection of watershed processes.
- The Alternative Compliance mechanism is unclear, is subject to Regional Board Executive Officer approval, but with no time line for that approval, and creates uncertainty as to what kinds of Alternatives could potentially be approved. The City does not have surplus land upon which alternative compliance or off-site mitigation could be conducted, and by ordinance prohibits development within Parks and Open Spaces, and on land zoned for agriculture. One potential result will be to push development into currently open and undeveloped space outside the City limits and existing urban boundaries.
- By including the Central Coast post-construction requirements in the Revised Phase II Permit, the State Water Board must make the necessary findings to support their conclusion that they are scientifically justified.
- The post-construction requirements are unproven. It is unclear whether the additional retention requirements will result in significant additional protections to watershed process, which has been acknowledged by Regional Board staff.